### 215.42

# **Adjunctive Income Eligibility**

### **Overview**

#### **Policy**

Federal law requires that applicants certified as eligible for certain other assistance programs are automatically income eligible for the WIC Program. This is referred to as adjunctive income eligibility. Adjunctively income eligible applicants must also have a nutritional risk to qualify for the WIC program.

#### **Definition**

"Certified as eligible" means that the individual or family unit is eligible for the program although they may not be currently participating in the program. Some households may have incomes exceeding 185 percent of the federal poverty guidelines. However, eligibility for one of the other programs is the determining factor in these households.

### Who is adjunctively income eligible?

An applicant is adjunctively income eligible for WIC if the applicant is:

- Certified as eligible to receive benefits from Food Assistance (SNAP), Medicaid, or FIP/TANF
- Certified as income eligible with the Iowa Head Start or Early Head Start Programs (HS/FHS)
- Presumptively eligible for either FIP/TANF or Medicaid (pending completion of the program's eligibility process)
- An applicant for the Medicaid Home and Community Based Ill and Handicapped Services (HCBS-IH), Intellectual Disability waiver (ID), AIDS/HIV, or Brain Injured (BI) waiver program (includes applicants on a waiting list), or
- A member of a household with:
  - o A FIP/TANF recipient or
  - o A pregnant woman or an infant currently on Medicaid or
  - o A child certified as income eligible with the Iowa HS/EHS Programs.

#### Notes:

The Food Assistance Program identifies a head of household to receive benefits for all household members. Therefore, all individuals in that household are income eligible for WIC.

If the only household member currently on Medicaid is a child, only that child is adjunctively income eligible for WIC. This includes the HCBS-IH, ID, AIDS/HIV and BI waiver programs.

The Family Investment Program (FIP) is Iowa's Temporary Assistance to Needy Families (TANF) program. In the data system, FIP is listed as TANF.

Continued on next page

# Adjunctive Income Eligibility, continued

The Iowa HS/EHS program adjunctive eligibility will only be valid if the participant was screened for income eligibility and meets the 100% and/or 130% income eligibility requirements of the program. If participants are adjunctive eligible for HS/EHS participation based on programs WIC also accepts, they will need to provide proof of that program participation to WIC. The Iowa WIC HS/EHS adjunctive eligibility form is only valid for 1 year after dated by HS/EHS staff. While HS/EHS screens income only once per enrollment cycle (which exceeds one year) their screen can be used the adjacent year without a new HS/EHS income screen, however we will need a new form signed and dated by HS/EHS staff to validate continued enrollment in the HS/EHS program.

### Record verbal report of income

Sources of income, amounts and time periods must still be recorded for adjunctively income eligible participants. However, verbal declaration of this information is adequate. This should be documented in the data system by selecting "Verbal report" as the proof provided.

#### **Documenting proof**

Adjunctively income eligible applicants must provide documentation that they are certified eligible to receive benefits from the specified programs. Proof of documentation provided must be recorded in the WIC data system.

#### **Examples of proof**

Acceptable documentation includes:

- A notice of program eligibility, or
- Documentation of residence with the head of the household named for Food Assistance purposes, or
- Documentation of residence with a FIP/TANF or Medicaid recipient, or
- Notice from Department of Human Services or Child Health Specialty Clinic that application for HCBS-IH, Intellectual Disability (ID), waiver AIDS/HIV, or Brain Injured (BI) waiver has been filed, or
- Notice from Department of Human Services or Child Health Specialty Clinic that an individual is eligible for HCBS-IH, ID, AIDS/HIV or BI waiver, or
- Verification of current Medicaid eligibility in the Iowa Medicaid Portal Application (IMPA) online system.

#### Notes:

Documentation of residence may be a letter, an envelope addressed to the head of the household, or a program eligibility notice or program identification card that shows a head of household address that matches the WIC applicant's address.

Continued on next page

# Adjunctive Income Eligibility, continued

An Iowa Medicaid identification card alone cannot be used as proof of adjunctive eligibility; the eligibility period is not identified on the card.

When a participant's Medicaid ID number has been documented in the WIC data system, that participant no longer needs to present their Medicaid card for eligibility purposes. However, WIC staff must verify current Medicaid eligibility in IMPA (or ELVS, Signifycommunity, or EDISS) if they are also a MCH Agency) at each certification appointment.

### **Policy reference**

WIC Policy Memorandum #2013-3 Income Eligibility Guidance MPSF:WC-98-13-P Documentation of Food Stamp Program Participation in an EBT Environment

## **Documenting Proof**

The table below describes how to document proof and what to do when applicants do not present proof of adjunctive eligibility.

proof of adjunctive eligibility.	
If the applicant	Then
brings proof OR	- record the program(s) conferring adjunctive eligibility,
Medicaid eligibility has already	
been verified in IMPA	- document the type of proof provided, and
	- ask for a verbal declaration of income
	(sources, amount and period), and select "Verbal report" for the proof provided for
	income.
fails to bring proof (forgot it) OR	- record the program(s) conferring adjunctive eligibility and leave the field, "Proof
presents a Medicaid card AND	provided," blank;
their Medicaid eligibility cannot be verified	- ask for a verbal declaration of income
while the participant is in	(sources, amount and period);
the clinic (e.g., Internet server is down) AND	- leave the field, "Proof", blank;
the participant has no other proof	- print and complete the "Signed Statement"
of income (adjunct income eligibility for	from the WIC data system;
another program, pay stubs, etc.)	- scan and save the completed "Signed
	Statement" in the participant record in the
	WIC data system.
	- tell participant to bring or provide proof via
	electronic means (i.e. text or email) within 30
	days in order to continue program
	participation; and
	- continue the assessment to determine
	nutrition risk.
	- A participant must provide two out of three
	required documents; identity, income and
	residency. If the participant is missing proof

	of adjunct eligibility and identity or residency, then the certification may not be completed.  Notes:  The missing proof of income field will trigger the option to provisionally certify an applicant when the CPA clicks on the Certify button. Provisional certification results in one month of benefits and an automatic system alert about the need to provide proof of income within 30 days to continue receiving services. Make arrangements for the applicant to provide the missing proof in the next month.  If applicable, verify the participant's Medicaid status in IMPA when Internet access is available.  If currently eligible, fulfill provisional eligibility in the WIC data system, issue their next two months of benefits and call the participant to reschedule their next appointment.  If not eligible, call the participant to
	confirm their arrangements regarding what proof will be needed to fulfill their provisional eligibility.
cannot reasonably provide proof of income (e.g., theft, loss, or disaster)	- record the program(s) conferring adjunctive eligibility, - select "Affidavit" as the proof provided, - print and complete the "Signed Statement" from the WIC data system, - scan and save the completed "Signed Statement" in the participant record in the WIC data system, and - ask for a verbal declaration of income (sources, amount and period), and select "Verbal report" for the proof provided.  Note: "Affidavit" is the formal name for the print out "Signed Statement" completed by an applicant.

# Adjunctive Income Eligibility, continued

### **Proration override**

At the provisional certification appointment a proration override may be completed to ensure the participant has adequate benefits prior to returning to fulfill proof within 30 days.